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6 Attorneys for Defendant  
RICARDO DURAN  
7

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,	) Case No. 2:20-cr-00228-JAM-1
	)
12 Plaintiff,	) <b>STIPULATION AND ORDER TO</b>
	) <b>CONTINUE STATUS CONFERENCE AND</b>
13 vs.	) <b>EXCLUDE TIME</b>
	)
14 RICARDO DURAN,	) Date: March 16, 2021
	) Time: 9:30 a.m.
15 Defendant.	) Judge Hon. John A. Mendez
	)
16 _____	)

17 IT IS HEREBY STIPULATED by and between Phillip A. Talbert, Acting United States  
18 Attorney, through Alexis Nelsen, Assistant United States Attorney, counsel for Plaintiff  
19 (hereinafter “the government”) and Heather Williams, Federal Defender, through Assistant  
20 Federal Defender Lexi Negin, counsel for Defendant Ricardo Duran (hereinafter “defense  
21 counsel”), **that the status conference scheduled for March 16, 2021 may be vacated and**  
22 **continued to April 27, 2021 at 9:30 a.m.**

23 Defense counsel represents that she requires additional time to review discovery, conduct  
24 further legal research; meet with her client to discuss potential resolution; and otherwise prepare  
25 for trial. Defense counsel believes that failure to grant the requested continuance would deny Mr.  
26 Duran the reasonable time necessary for effective preparation, taking into account the exercise of  
27 due diligence. The government does not object to the continuance.  
28

1 Based upon the foregoing, the parties agree time under the Speedy Trial Act should be  
2 excluded through and including April 27, 2021; pursuant to 18 U.S.C. §3161(h)(7)(A) and  
3 (B)(iv) [reasonable time to prepare] and General Order 479, Local Code T4 based upon defense  
4 preparation.

5 Respectfully submitted,

6 HEATHER E. WILLIAMS  
7 Federal Defender

8 Date: March 12, 2021

/s/ Lexi Negin  
9 LEXI NEGIN  
Assistant Federal Defender  
Attorneys for Defendant  
10 RICARDO DURAN

11 Date: March 12, 2021

12 PHILLIP A. TALBERT  
Acting United States Attorney

13 /s/ Alexis Nelsen  
14 ALEXIS NELSEN  
Assistant United States Attorney  
15 Attorneys for Plaintiff

**ORDER**

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

The Court orders the time excluded from March 16 through April 27, 2021 from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv) [reasonable time for defense counsel to prepare] and General Order 479, (Local Code T4). The Court finds the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial. It is further ordered the March 16, 2021 status conference shall be continued until April 27, 2021, at 9:30 a.m. before Honorable John A. Mendez.

IT IS SO ORDERED.

Date: March 12, 2021

/s/ John A. Mendez

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THE HONORABLE JOHN A. MENDEZ  
UNITED STATES DISTRICT COURT JUDGE